

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION**

HAYWARD INDUSTRIES, INC.,

Plaintiff

v.

BLUEWORKS CORPORATION,  
BLUEWORKS INNOVATION  
CORPORATION, NINGBO C.F.  
ELECTRONIC TECH CO., LTD; NINGBO  
YISHANG IMPORT AND EXPORT CO.,  
LTD.

Defendants.

Civil Action No. 3:20-CV-710 -MOC-SCR

**DEFENDANTS' SECOND MOTION FOR RELIEF FROM THE  
TEMPORARY RESTRAINING ORDER**

Defendants Blueworks Corporation (“Blueworks Corp.”), Blueworks Innovation Corporation (“Blueworks Innovation”), Ningbo C.F. Electronic Tech Co., Ltd. (“Ningbo C.F.”), and Ningbo Yishang Import and Export Co., Ltd. (“Ningbo Yishang”) (collectively, “Defendants”) hereby move the Court for Relief from the Temporary Restraining Order [DE 393]. The Court instructed the Defendants to request relief on a case-by-case basis in its Order on Defendants’ Motion for Clarification [DE 404].

Defendants previously sought relief to transfer assets on April 19, 2014 [DE 412], which remains pending before the Court.

Defendants now seek further relief to transfer assets to make the payments for its April payroll, federal payroll taxes due on May 15, 2024, and payment of invoices to their counsel as set forth in Defendants’ Memorandum of Law in support of this motion being filed

contemporaneously herewith.

Pursuant to LCvR 7.1(b), the parties conferred by email between May 10 and May 13, 2024 and counsel for Plaintiff consented to Defendants' Motion with respect to Bluework's federal payroll taxes, but opposes Defendants' Motion with respect to Blueworks' payroll and Defendants' payment of invoices to their counsel.

Dated: May 13, 2024

Respectfully submitted,

/s/ Christina Davidson Trimmer

Christina Davidson Trimmer

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Samuel Alexander Long, Jr.

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*Attorneys for Defendants*

**CERTIFICATE OF SERVICE**

I hereby certify that on May 13, 2024, the foregoing document was served on all counsel of record using the Court's CM/ECF system, which will send notification of such filing to any CM/ECF participants.

Respectfully submitted,

/s/ Christina Davidson Trimmer

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